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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
Hazardous Sites Cleanup Program
Wilkes-Barre Regional Office
667 North River Street
Wilkes-Barre, PA 18705
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May 1, 1991

U.S. EPA - Region III
c/o Mr. Mike Towle (3HW21)
841 Chestnut Building
Philadelphia, PA 19107

RE: Final Draft
Remedial Investigation Report
C & D Recycling Site
Foster Township, Luzerne County

Dear Mr. Towle:

The review of the above referenced submission has been completed by the Department. The following comments and recommendations have considered previous items noted in Department correspondence dated April 17, 1990. In addition, comments regarding past operations at this site are discussed in the last section of this letter.

Section 3.2.4, Page 3-14: The detection of methylene chloride and acetone (14 and 12 ppb) in the Tank 1 samples are respectively low with respect to the interpretation as lab contamination. However, the comparison to the QA/QC samples should be included if this interpretation is stated.

Section 3.3.2, Page 3-29: The revised report does provide an interpretation on the possible origin of the alkaline pond water. The report does note the difference in the lithological description of the carbonate described by Hart and PADER. The comparison of the pond with historical pH of the artesian well was not performed as recommended. The comparison of two surface water samples collected by PADER on May 30, 1985 conflict with the alkaline results. These samples show pH of 5.9 and 6.3 with respective alkalinity values of 8.0 mg/l for both samples. The pH of two sediment samples collected during this sampling was 6.34 and 6.43. The testing for field pH at the pond, artesian well, and selected creek locations is recommended during future site visits.

Section 3.5.2, Page 3-53: The lithological descriptions of carbonates differ from the observations of PADER. The PADER interprets these intervals as siltstones.

Section 3.6.2.1.16, Page 3-120: The validity of the composite sample for EP-Toxicity may be questionable with respect to the high concentrations of metals in the blank. The revised report did not elaborate on this significance. However, the potential of the soils to leach above background concentrations into the groundwater will require elaboration during the Feasibility Study, and will be a factor in determining clean-up levels.

Section 3.6.4, Page 3-145: The rationale for the collection of the core interval analyzed for metals (159 feet below grade) is not stated. The core samples analyzed on November 22, 1988 appear to be at depths slightly below the influence of significant weathering. The RI Report should elaborate if selection was influenced by depth of weathering, lithology, or other factors.

Section 3.7.6.1, Page 3-237: The procedures for purging domestic wells is stated at one to three volumes of the well/plumbing system. The calculation and volume of water purged should be shown on Tables 3-45, 3-47, and 3-50.

Section 4.3.2.4, Page 4-27: The cadmium concentration of 13 ppb exceeded the primary MCL at the Sulima residence in October 1988. The location and sampling date should be identified in this section if on-site or off-site sample locations exceed primary MCL's.

Section 5.0, Page 5-4: The interpretation that elevated levels of inorganics are the partial result of acid mine drainage (AMD) at off-site locations has not been demonstrated by the RI data. This section indicates that further work would be required to define the horizontal and vertical extent of the AMD influence. However, this section and preceding discussion sections would appear to strongly suggest that drainage from the coal areas is one of the potential sources for elevated inorganics. The structural and topographic data would indicate that surface and groundwater flow patterns would be from the site towards the north and south coal basins. The comparison of USEPA samples collected February 14, 1990 at the Pond Creek (GW-SW1-1) and Sand Run (GW-SW2-1) indicate relatively low field pH as anticipated from this type of lithology. However, it was noted that the concentrations of lead and other inorganics listed in 25 Pa. Code 264 Appendix B, were well below the Interim Primary Drinking Water Standards. The lateral spread of mine refuse and potential use as fill at on-site and off-site locations could possibly be a contributing factor in observed low pH and elevated inorganics, although no data or documentation appears to exist to support this potential.

In addition to the above comments, this writer has provided additional information which was provided by Jane Sulima on a telephone call on March 28 and April 8, 1990.

1. The description of the furnace and stacks on Page 1-6 does not appear to provide the information on the equipment and operational changes which occurred at the site. Ms. Sulima indicated that one of these stacks had collapsed during a period of active operation at the site. A review of Bureau of Air Quality files indicate that two stacks existed when the PADER Air Quality Primary Plant Information Plant Form was submitted during October 1974. The data from the Pacific Environmental Services (USEPA contractor) indicates that stack 1 vents effluent from the four furnaces, and stack 2 vents effluent from the front of the two hoods installed over the doors. This report indicates that stack 2 was equipped with an induced draft fan. An Inspection Report dated June 6, 1975 indicates that the hoods were not controlling the fugitive emissions. The hood stack is again noted in an Inspection Report dated October 11, 1974.

   The files indicate that an afterburner was operational during May 1981. The PADER Chapter 127 Inspection Report dated June 16, 1981 appears to indicate that there was only one stack in operation at this time. Therefore, it would appear that the stack 2 was removed sometime between October 1974 and May 1981. The documentation on any accidental collapse of one of the stacks does not appear to exist in the files.

2. The first paragraph on Page 1-10 refers to a letter which indicates that no visible emissions have been observed or malodors detected by PADER. In this context it would appear that no significant violations was noted prior to or after the date of this letter (June 1, 1981). A review of PADER Air Quality files indicated apparently 8 violations prior to this date, and 5 violations after this date. These violations consisted predominantly of stack opacity or open burning problems. The last violation noted occurred on June 20, 1983 for opacity exceeding 60%. The noted inspections during 1984, 1985, and 1986 noted no violations with no significant activity.

3. The open burning which occurred during Lurgan and early C & D operations is briefly discussed on Page 1-9. The approximate location of an open burn pit is also located on Figure 1-2. This phase of open burning was discussed with an inspector with PADER Bureau of Air Quality. It was noted that open burning had occurred at several locations along the access road south of the main facility building. Therefore, the referenced location appears to locate the area of activity, but not specifically a point location. In addition, the PADER Bureau of Air Quality file indicates that the open burning location changed in a summary of 1974 inspections attached to Departmental correspondence dated September 24, 1974. A inspection on June 7 indicated that small amounts of wire were burned at the side of the property. A subsequent inspection on June 11 indicated that wire was being burned in the lower field.

4. The furnace is alleged to have holes to collect molten lead. These holes had been cemented in at some point in time. The discussion with PADER Air Quality indicated that the material was placed in cube shaped baskets which were loaded into the furnaces by forklift. No documentation exists in the files on how molten metals were collected on the site.

5. Ms. Sulima objected to the word "alleged" with respect to the sentence on the third paragraph, Page 1-9. This objection was based on C & D Recycling being cited with an extinction fee by the PADER Bureau of Forestry. This writer contacted Forest District Office District 20 (Bloomsburg) to inquire on information on this incident. Mr. Roger Coady indicated that the fire which originated in burner barrels escaped due to high winds. He also related that two employees were present during this fire and confirmed the source.

6. The description of equipment and operation of the structure identified as the old furnace is absent in the report, and no documentation appears to exist in PADER Air Quality files. The RI sampling appears to have been adequate to define the severity of contamination for the site and provide sufficient data to determine an acceptable remedial action during the FS. However, any additional information regarding past operations may be useful to determine the actions to be performed on the site structures.

7. The last paragraph on Page 1-8 indicates similar operations for Lurgan and early C & D Recycling. The Air Quality files (memo to file dated 2/21/79) indicates that a meeting with PADER and C & D Recycling indicated a change in the type of wire being processed. This information noted that the site would process predominantly types 3S and A21 wire. The A21 wire would be approximately 25% of the material and would require burning. The other wire type would be chopped up for processing.

Thank you for giving us the opportunity to review this document for the C&D site. If you have any questions, feel free to call at (717) 826-2064.

Sincerely,

John S. Mellow

John S. Mellow
Project Officer